

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

**Jennifer Vang,**

**Plaintiff,**

**v.**

**Kohler Co.,  
a Domestic Corporation,**

**Defendant.**

**Case No. 2:09-cv-00842-WEC**

**MOTION TO WITHDRAW AS COUNSEL OF RECORD  
FOR PLAINTIFF JENNIFER VANG**

Cross Law Firm, S.C. respectfully requests that this Honorable Court grant counsel's Motion to Withdraw as Counsel of Record for Plaintiff Jennifer Vang, and in support thereof states as follows:

1. This case was filed by Plaintiff Jennifer Vang on or about September 2, 2009, alleging violations of the Fair Labor Standards Act and Wisconsin wage payment laws on behalf of herself and others similarly situated.
2. After initially being certified as a collective action pursuant to the Fair Labor Standards Act and a class action pursuant to Fed. R. Civ. P. 23, it was ultimately determined by the Court in late February 2013 that this matter could be pursued only as an individual claim by Plaintiff Jennifer Vang. (*see* Dkt. 135-0).
3. Once the decision was reached by the Court, Cross Law Firm, S.C. began attempts to contact Plaintiff Jennifer Vang regarding the status of her matter.
4. After initial phone calls were not returned, Cross Law Firm, S.C. sent written correspondence to Plaintiff Jennifer Vang's address to which all previous correspondence had been sent.

5. The written correspondence was sent back to Cross Law Firm, S.C. as “return to sender.”

6. Plaintiff Jennifer Vang did not inform Cross Law Firm, S.C. of her change in address.

7. Cross Law Firm S.C. then engaged in a lexis nexis search to locate potential addresses for Plaintiff Jennifer Vang and discovered three potential addresses.

8. Correspondence was then sent to all three potential addresses for Plaintiff Jennifer Vang.

9. On April 8, 2013, after no response to previous correspondence, Cross Law Firm, S.C. sent Plaintiff Jennifer Vang a letter via certified mail to all three potential addresses informing Plaintiff Jennifer Vang: that Cross Law Firm, S.C. had been urgently trying to reach her via telephone and letter for the past several weeks; that Cross Law Firm S.C. has had trouble with Plaintiff Jennifer Vang’s responsiveness throughout representation in this matter; that Plaintiff Jennifer Vang did not inform Cross Law Firm, S.C. of her change of address; and that if Cross Law Firm S.C. did not receive any responsive communication that a motion to withdraw would be filed.

10. Plaintiff Jennifer Vang has been unresponsive to all attempts at contact made by Cross Law Firm S.C. and has failed to contact Cross Law Firm, S.C. after being informed that the failure to contact Cross Law Firm, S.C. would result in the filing of the instant motion.

11. Accordingly, Plaintiff’s counsel cannot continue to represent Plaintiff Jennifer Vang in this matter.

12. Plaintiff’s counsel has informed Plaintiff Jennifer Vang that counsel would be filing the instant Motion to Withdraw as Counsel of Record for Plaintiff Jennifer Vang via

certified mail dated April 8, 2013, which was signed as received by Josh Vang on April 11, 2013.

13. Plaintiff's counsel will serve Plaintiff Jennifer with a copy of this Motion as well as the Court's Order related to this Motion via certified mail.

14. Counsel can be available for a telephonic or in-person conference at the Court's convenience should any additional information be required.

15. A proposed Order is attached to this Motion to Withdraw as Counsel of Record for Plaintiff Jennifer Vang.

WHEREFORE counsel for Plaintiff Jennifer Vang respectfully requests that this Honorable Court GRANT the instant Motion to Withdraw as Counsel of Record for Plaintiff Jennifer Vang.

Dated this 17th day of April, 2013.

**CROSS LAW FIRM, S.C.**  
Attorneys for Plaintiff

**s/ Noah Reinstein**

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